

3. Roger Haycraft
Daniel Mitchell
Tom Hodge, Construction Director
c/o J. Robin Lindley
Jared Gregory LeBlanc
Buck Keenan Gage Little & Lindley, LLP
700 Louisiana, 51st Floor
Houston, Texas 77002
4. Jill C. Reeves
Current address unknown, believed to reside in Oklahoma
5. Jim Parnell
ENGlobal Engineering, Inc.
6. Eddie McMillan
Current address unknown, believed to reside in Oklahoma
7. Dale Deverall
Current address unknown

II. Expert Witnesses

1. Martha S. Dickie
Bo Blackburn
Boone Almanza
Akin & Almanza
2301 S. Capital of Texas Hwy., Bldg. H
Austin, Texas 78746

Defendant reserves its right to supplement its designation of testifying and expert witnesses consistent with the Scheduling Order, any agreement between the parties, and the Federal Rules of Civil Procedure.

III. Proposed Exhibits

1. QCS 1 – 15 (QCS emails);
2. QCS 336 (Roger Haycraft email);
3. QCS 325 (Jill Reeves email);

4. QCS 326 (Jill Reeves email);
5. QCS 328-300 (Eddie Hooks email);
6. QCS 330 (Eddie Hooks email);
7. QCS 331 (Jill Reeves email);
8. QCS 332-335 (Jill Reeves email/statement);
9. QCS 340 (Eddie Hooks email);
10. QCS 342 (Haycraft email);
11. BWPP 1-7 (Boardwalk Inspection training);
12. QCS 488 (Boardwalk inspector list);
13. BWPP 21 (Boardwalk QA/QC Plan);
14. BWPP 213-438 (Inspector Handbook); and
15. QCS 516 (QCS Insurance Certificate).

Defendant reserves the right to supplement its exhibit list consistent with the Scheduling Order, any agreement between the parties, and the Federal Rules of Civil Procedure.

Respectfully submitted,



Martha S. Dickie
State Bar No. 00000081
Bo Blackburn
State Bar No. 24006853
Akin & Almanza
2301 S. Capital of Texas Hwy., Bldg. H
Austin, Texas 78746
(512) 474-9486
(512) 478-7151 – Fax

**ATTORNEYS FOR DEFENDANT
ON AND OFFSHORE QUALITY
CONTROL SPECIALIST, L.L.C.**

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the above and foregoing has been sent via the Court's electronic filing system to counsel of record, listed below on the 14th day of August, 2009:

Sean E. Breen
Laura D. Tubbs
Howry Breen, LLP
1900 Pearl Street
Austin, Texas 78705

J. Robin Lindley
700 Louisiana, Suite 5100
Houston, Texas 77002



Bo Blackburn